

**Ron  
Myers/RTP/USEPA/US**

04/03/2009 07:56 AM

To "Thomas Gasloli" <gaslolit@michigan.gov>,  
sorrell.candace@epa.gov, dewees.jason@epa.gov  
cc a-and-r-docket@epa.gov  
bcc

Subject Re: Proposed Method 201A & 202

Tom:

Thanks for the comments. We will consider the two comments on the proposed Method 201A since one of the goals in this revision is to reduce confusion and be as clear as possible so the results are as consistent as possible. I think you are correct about the lower catch weights that we might expect, although the development of good data quality objectives may indicate the need to extend sampling times to obtain a weighable mass.

We recognize that the EPA funded Audit program will be gone soon. EMC is working to facilitate a viable commercial audit program that would make all of the currently available audit materials available but at a cost to the source test contractor. We worded section 9.11, 9.12 and 9.13 the way we did to alert people of the potential for audit materials being available in the future. You may want to talk to Tom Mazza about the presentation Robin Segall made on the future of the EPA Audit program at the Source Evaluation Society Conference two weeks ago. For the precision testing that we will be performing this spring/summer we will develop audit materials to use with two of the four sampling trains that will be used for each of the ten quad sampling trains. This may be a good basis for the commercial audit supplier to develop audit material for use in the future. As with the other two comments you provided, we will consider addressing the future absence of the EPA audit materials in the final rule.

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Ron Myers

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**"Thomas Gasloli"** <gaslolit@michigan.gov>

03/26/2009 03:52 PM AST

To Ron Myers/RTP/USEPA/US@EPA

cc "Kajiya-Mills, Karen" <Kajiya-MillsK@michigan.gov>

bcc

Subject Re: Proposed Method 201A & 202

Ron

A few comments regarding the proposed 201A and 202.

The proposed 201A does not very clearly state the requirement for isokinetic. 8.3.4 says to void the sample if the range isn't met, but doesn't state the range. It isn't until 8.5.4 where selecting a nozzle is discussed that a range is mentioned. I think it would be a good idea to add language specifying that the isokinetic must meet 80-120% either at Eq.40 in 12.5, or in Table 6. This will save state agencies from a lot silly arguments with testing firms.

I also don't understand the use of glass dishes and glass 250 ml beakers for drying the filter and rinses in Proposed 201A. These seem like very heavy containers for the small amount of particulate catch. Wouldn't it be better to use the light weight metal tins used in Proposed 202? I believe some labs have been using thin light weight synthetic beaker liners for OTM-28. Something like that would be good too. But glass just seems too heavy for the PM we are likely to see.

Why does Proposed 202 use the EPA Audit Program language at 9.11, 9.12, and 9.13? This program is scheduled to end September 30, 2009.

Tom Gasloli

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>>> <Myers.Ron@epamail.epa.gov> 3/26/2009 11:44 AM >>>

PM test method stakeholders:

Yesterday I sent you an e-mail announcing the publication of the proposed replacement to Method 201A and 202. Unfortunately, while the first link I supplied worked yesterday, I have been told it doesn't work today. The second link to the EMC web page works as we have some level of control of that web page. If you want to get to the published Federal register document and the associated docket, you will have to go to <http://www.regulations.gov/search/index.jsp>. In the search box enter "measurement of condensable particulate" (include the quotes), click Go. At the next page narrow the results (in the left most column) to proposed rules. and you should only get one document. By clicking on the "PDF" icon you can get the document as it was published in the Federal Register and by clicking on the yellow and white folder icon

(<http://www.regulations.gov/fdmspublic/component/main?main=DocketDetail&d=EPA->

[HQ-OAR-2008-0348](#) ) you will see all the documents that I have placed in the docket. To comment you can click on the yellow balloon icon ( <http://www.regulations.gov/fdmspublic/component/main?main=SubmitComment&o=090000648092dcb5> ) . There are several other methods to submit a comment that are identified in the preamble section. If you submit a comment, I would appreciate a separate e-mail with the comment so I have an e-mail address allowing me to contact you more easily should I want some additional information or explanation.

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Ron Myers

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